**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AMPEX CORPORATION,
 	
        Plaintiff,
 	
        v.
 	
EASTMAN KODAK COMPANY,
ALTEK CORPORATION, and
CHINON INDUSTRIES, INC.,
 	
        Defendants.
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	) C.A. No. 04-1373 (KAJ)
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**NOTICE OF DEPOSITION OF
<u>DEFENDANT ALTEK CORPORATION</u>**

TO: All Parties and their Attorneys of Record:

      PLEASE TAKE NOTICE: Pursuant to Federal Rule of Civil Procedure 30(b)(6), Ampex will take the deposition of Defendant Altek Corporation ("Altek"), commencing on February 24, 2006, at 9:00 a.m., at the Ambassador Hotel, 188, Chung Hwa Road, Section 2, Hsinchu 300, Taiwan, or at such other time and place agreed upon by the counsel to the parties.

      Altek shall designate one or more of its officers, directors or managing agents, or other persons with knowledge of the matters set forth in Schedule A of this notice to appear and testify on its behalf at the deposition. The persons so designated shall testify as to matters known or reasonably available to Altek.

      This examination will be taken before a Notary Public or other person authorized to administer oaths and will be recorded stenographically and/or by video and shall continue from day to day until completed.

You are invited to attend.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Julia Heaney (#3052)
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January 25, 2006

SCHEDULE A

INSTRUCTIONS AND DEFINITIONS

Ampex incorporates by reference the instructions and definitions set forth

in its First Set of Document Requests to Altek.

SUBJECT MATTER CATEGORIES

1.   The structure and operation of the source code for each Altek-Kodak device.

2.   The internal operation of each Altek-Kodak device from the time a user presses the shutter button until the time a file is stored on an SD/MMC card.

3.   The internal operation of each Altek-Kodak device from the time a user presses the Review button until the time a picture is displayed on the device's LCD.

4.   The internal operation of each Altek-Kodak device from the time a user selects the Multi-up menu option in Review mode until the time a Multi-up window is displayed on the device's LCD.

5.   The internal operation of each Altek-Kodak device from the time a user selects the Magnify option in Review mode one or more times until the time a magnified picture is displayed on the LCD.

6.   Each Altek-Kodak device's compliance with Exif and DCF standards including, but not limited to, identification of the version of each standard with which each Altek-Kodak device complies.

7.   The amount, if any, and reasons for any difference in resolution between the CCD, the CFA image, and a "Best" quality body image in each Altek-Kodak device.

8.   Any and all uses of direct memory access (DMA) in each Altek-Kodak device including, but not limited to, the use of DMA for transfers between SDRAM and the IRAM within the Hyperstone processor and between SDRAM and an SD/MMC card.

9.   The transfer path between SDRAM and an SD/MMC card in each Altek-Kodak device including, but not limited to, an identification of any "intervening circuitry" between the SDRAM and an SD/MMC card through which data passes during a data transfer between SDRAM and an SD/MMC card.

10.   Identification of all third-party materials available to Altek developers during the development of each Altek-Kodak device including, but not limited to, third-party software, programmer's guides, and information relating to the development environment of each processor within each Altek-Kodak device.

11.   Identification of documents relating to any Hyperstone microprocessor including, but not limited to, all documents received from Hyperstone.

12.   The selection and use of particular target JPEG compression ratios and/or target JPEG-compressed file sizes in each Altek-Kodak device, including but not limited to Altek's testing of sample images.

13.   The structure and operation of the image processing chain in each Altek-Kodak device including, but not limited to, the operation of A-star functions, bad pixel correction, defect correction, sigma filtering, color correction, edge enhancement, thumbnail generation, JPEG compression, and any other image processing performed by each Altek-Kodak device.

14.   The storage of the Bayer pattern in SDRAM in each Altek-Kodak device.

15.   The storage of image information in each Altek-Kodak device including, but not limited to, camera settings, capture settings, A-star settings, and any other user-defined settings.

16.   The differences, if any, between the most recent and/or most complete version(s) of the Engineering Requirements Specification for each Altek-Kodak device and the actual implementation of the corresponding Altek-Kodak device.

17.   Identification of Altek-Kodak device "Types" (e.g. Type 3a, Type 3b, Type 4, *see* Storer 6/8/2005 Deposition Tr. at 29), as such "Types" are used at Altek, on what basis such device "Types" are defined, the identity of which particular Altek-Kodak devices are designated as certain "Types," and the structural and/or operational differences, if any, between the Altek-Kodak devices within each Type.

18.   Identification of any ASIC processor (e.g. Sunny4, Sunny6) incorporated into each Altek-Kodak device.

19.   The incorporation of any Hyperstone processor into any Altek-Kodak device including, but not limited to, identification of the specific Hyperstone processor (e.g. E1-32XS, E1-16XS) incorporated into each such Altek-Kodak device.

20.   The structure and operation of the Hyperstone processor in each Altek-Kodak device.

21.   The use of the Hyperstone processor in each Altek-Kodak device during image processing including, but not limited to, identification of all internal components and/or registers used, if any, during such image processing.

22.   The generation of thumbnail images in each Altek-Kodak device including, but not limited to, the use of the DSP Execution Unit (*see, e.g.*, ALT000000847) and any other components and/or registers used during such generation.

23.   The use of the Hyperstone processor in each Altek-Kodak device during image transfer between SDRAM and an SD/MMC card including, but not limited to,

identification of all internal components and/or registers used (e.g. ALT000000847 (Data Bus, Register Set, etc.)), if any, during such transfer.

24.   Altek's relationship with Kodak including, but not limited to, identification of requirements received by Altek from Kodak during development of Altek-Kodak devices.

CERTIFICATE OF SERVICE

I, Julia Heaney, hereby certify that on January 25, 2006, I caused to be electronically filed the foregoing *Notice of Deposition of Defendant Altek Corporation* with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

> Paul M. Lukoff, Esquire
> David E. Brand, Esquire
> Prickett, Jones & Elliott, P.A.

and that I caused copies to be served upon the following in the manner indicated:

BY HAND

> Paul M. Lukoff, Esquire
> Prickett, Jones, Elliott,
> 1310 King Street
> Wilmington, DE 19899

BY FEDERAL EXPRESS

> Michael J. Summersgill, Esquire
> Wilmer Cutler Pickering Hale and Dorr LLP
> 60 State Street
> Boston, MA 02109

> */s/ Julia Heaney*
> Julia Heaney (#3052)